

# EXHIBIT A

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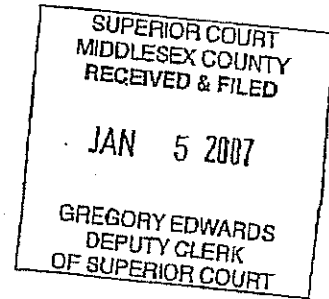
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GALEX WOLF, LLC

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GALEX WOLF LLC  
1520 U.S. Highway 130 Suite 101  
North Brunswick, New Jersey 08902  
(732) 257-0550  
Attorneys for Plaintiff



SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
MIDDLESEX COUNTY  
DOCKET NO. L-257-06 100139-01

ANTONIO BOLTON

Plaintiffs

vs.

Civil Action

COMPLAINT  
AND JURY DEMAND

CITY OF NEW BRUNSWICK;  
CLERK OF MUNICIPAL COURT  
OF CITY OF NEW BRUNSWICK;  
COUNTY OF MIDDLESEX;  
MIDDLESEX COUNTY  
CORRECTIONS CENTER;  
JOHN DOES, (#1 THRU #5)

Defendants.

The plaintiff, Antonio Bolton, residing at 43 Arden Street, Somerset, New Jersey complaining of the defendants says:

FIRST COUNT

1. On or about the 7<sup>th</sup> day of June, 2005 the plaintiff, Antonio Bolton, was falsely imprisoned and deprived of his liberty in the Middlesex County Work House until June 29, 2005, for a total of 22 days.

2. The defendants named herein and the John Does, whose identities are unknown,

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intentionally confined the plaintiff at the Middlesex County Work House without legal justification, depriving the plaintiff of his civil liberties and entitling the plaintiff to tort damages.

3. The plaintiff was confined at the Middlesex County Work House during the aforementioned period of time against his will and as a result of the negligence of the defendants named herein.

4. The plaintiff was properly brought before the Municipal Court judge of the Municipal Court of the City of New Brunswick on June 7, 2005. The appearance was based upon a failure to pay a Municipal Court fine of \$713.00.

5. On the aforementioned date the judge of the Municipal Court ordered that the plaintiff be released upon the payment of a fine in the amount of \$20.00.

6. Due to the negligence of the clerk of the court and John Does, whose true identities are unknown to the plaintiff, an Order was entered by the court which did not reflect the judge's Order that the plaintiff be immediately released.

7. At all times mentioned herein the Clerk of the Municipal Court of New Brunswick is an agent, servant, or employee of the defendant, City of New Brunswick.

8. At all times mentioned herein the defendants, John Does, whose true identities are unknown to the plaintiff, are agents, servants and/or employees of the defendants, City of New Brunswick, Middlesex County Corrections Center a/k/a the Middlesex County Work House; the Municipal Court of New Brunswick; and the County of Middlesex.

9. The plaintiff notified all the defendants named herein of the judge's decision to release him and they did ignore his demands to be released; they were further negligent and careless in their failure to investigate the matter; all of which caused the plaintiff to be unlawfully incarcerated at the Middlesex County Work House for the period of time set forth herein, against his will.

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10. As a direct and proximate result of the negligence of the defendants, plaintiff was caused to sustain severe mental anguish; loss of enjoyment of life; he was caused to lose time from his employment; he was caused to sustain permanent injury.

WHEREFORE the plaintiff demands judgment against the defendants for damages, interest and cost of suit.

**JURY DEMAND**

The plaintiff demands a trial by jury as to all issues.

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to the Rules, Richard Galex, Esq. is hereby designated as trial counsel.

**DEMAND FOR DISCOVERY OF INSURANCE COVERAGE**

Pursuant to Rule 4:10-2(b), demand is hereby made that Defendant disclose to Plaintiff's attorneys whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a Judgment which may be entered in this action or indemnify or reimburse for payments made to satisfy the Judgment and provide plaintiff's attorneys with true copies of such insurance agreements or policies, including but not limited to any and all declaration sheets. This demand shall be deemed to include and cover not only primary coverage but also any and all excess, catastrophe and umbrella policies.

Dated: December 27, 2006

GALEX WOLF LLC  
Attorneys for Plaintiff

By:   
RICHARD GALEX

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GALEX WOLF, LLC

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CERTIFICATION PURSUANT TO R. 4:5-1

RICHARD GALEX, does hereby certify as follows:

1. I am an attorney at law of the State of New Jersey, and an attorney in the law firm of Galex Wolf LLC., attorneys for the plaintiff, and am familiar with the above captioned matter.

2. To the best of my knowledge, information and belief, there is no other action pending about the subject matter of this Complaint in any court or arbitration proceeding nor are there any other persons known to me who should be added as parties to this matter nor are there any other actions contemplated.

3. I do hereby certify that the foregoing statements made by me are true to the best of my knowledge and if knowingly made false, I am subject to punishment.

Dated: December 27, 2006



RICHARD GALEX

# EXHIBIT B

GALEX WOLF LLC.  
1520 U.S. Highway 130 Suite 101  
North Brunswick, New Jersey 08902  
(732) 257-0550  
Attorneys for Plaintiffs

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**FILED**

**FEB 01 2008**

Judge Nicholas J. Stroumsos, Jr.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
MIDDLESEX COUNTY  
DOCKET NO. L 139-07

ANTONIO BOLTON

Plaintiff

vs.

Civil Action

CITY OF NEW BRUNSWICK  
ET AL

Defendants.

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**ORDER  
Amending Plaintiff's Complaint**

This matter having been brought before the Court on motion of Galex Wolf LLC, attorneys for PLAINTIFF, for an Order permitting the plaintiff to amend his complaint to include a Second Count alleging a violation of his civil rights ; and the court having considered the matter and good cause appearing;

It is on this 1 day of February 2008

ORDERED that the plaintiff is hereby permitted to file an Amended Complaint to include a Second Count alleging a violation of his civil rights; and it is further

ORDERED that the within Order shall be served on all parties within \_\_\_\_\_ days from the date hereof.

  
J.S.C.

*opponent considered  
this may  
be true for  
unfamiliar*

# EXHIBIT C





GALEX WOLF LLC

ATTORNEYS AT LAW

1520 U.S. Hwy. 130, Suite 101  
North Brunswick, NJ 08902  
(732) 257-0550 Fax (732) 257-5654  
www.galexwolf.com

**Richard Galex**

Certified by the Supreme Court  
of New Jersey as a Civil Trial Attorney  
Member NJ, FL, OH, TX, USVI Bars

**Andrew R. Wolf**

Member NJ Bar

**Henry P. Wolfe**

Member NJ, NY & MI Bars

**Steven B. Portnoff**

Of Counsel

**Charles N. Miller**

Of Counsel

February 14, 2008

Lora B. Glick, Esq.  
Dvorak & Associates  
390 George Street  
8<sup>th</sup> Floor  
New Brunswick, NJ 08901

Patrick J. Bradshaw, Esq.  
Kelso & Bradshaw  
132 Hamilton Street  
P.O. Box 1208  
New Brunswick, NJ 08903


Re: Bolton v. City of New Brunswick et al

Dear Counsel:

Enclosed herein please find an Order amending plaintiff's complaint together with a copy of plaintiff's First Amended Complaint in connection with the above matter.

Thank you for your attention.

Very truly yours,

  
RICHARD GALEX

RG/lv  
enc.

GALEX WOLF LLC  
1520 U.S. Highway 130  
Suite 101  
North Brunswick, New Jersey 08902  
(732) 257-0550  
Attorneys for Plaintiff

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
MIDDLESEX COUNTY  
DOCKET NO. L 139-07

ANTONIO BOLTON

Plaintiffs

Civil Action

vs.

**FIRST AMENDED COMPLAINT  
AND JURY DEMAND**

CITY OF NEW BRUNSWICK;  
CLERK OF MUNICIPAL COURT  
OF CITY OF NEW BRUNSWICK;  
COUNTY OF MIDDLESEX,  
MIDDLESEX COUNTY  
CORRECTIONS CENTER;  
JOHN DOES, (#1 THRU #5)

Defendants.

\_\_\_\_\_ /

The plaintiff, Antonio Bolton, residing at 43 Arden Street, Somerset, New Jersey complaining of the defendants says:

**FIRST COUNT**

1. On or about the 7<sup>th</sup> day of June, 2005 the plaintiff, Antonio Bolton, was falsely imprisoned and deprived of his liberty in the Middlesex County Work House until June 29, 2005, for a total of 22 days.

2. The defendants named herein and the John Does, whose identities are unknown, intentionally confined the plaintiff at the Middlesex County Work House without legal justification, depriving the plaintiff of his civil liberties and entitling the plaintiff to tort damages.

3. The plaintiff was confined at the Middlesex County Work House during the aforementioned period of time against his will and as a result of the negligence of the defendants named herein.

4. The plaintiff was properly brought before the Municipal Court judge of the Municipal Court of the City of New Brunswick on June 7, 2005. The appearance was based upon a failure to pay a Municipal Court fine of \$713.00.

5. On the aforementioned date the judge of the Municipal Court ordered that the plaintiff be released upon the payment of a fine in the amount of \$20.00.

6. Due to the negligence of the clerk of the court and John Does, whose true identities are unknown to the plaintiff, an Order was entered by the court which did not reflect the judge's Order that the plaintiff be immediately released.

7. At all times mentioned herein the Clerk of the Municipal Court of New Brunswick is an agent, servant, or employee of the defendant, City of New Brunswick.

8. At all times mentioned herein the defendants, John Does, whose true identities are unknown to the plaintiff, are agents, servants and/or employees of the defendants, City of New Brunswick, Middlesex County Corrections Center a/k/a the Middlesex County Work House; the Municipal Court of New Brunswick; and the County of Middlesex.

9. The plaintiff notified all the defendants named herein of the judge's decision to release him and they did ignore his demands to be released; they were further negligent and careless in their failure to investigate the matter; all of which caused the plaintiff to be unlawfully incarcerated at the Middlesex County Work House for the period of time set forth herein, against his will.

10. As a direct and proximate result of the negligence of the defendants, plaintiff was caused to sustain severe mental anguish; loss of enjoyment of life; he was caused to lose time from his employment; he was caused to sustain permanent injury.

WHEREFORE the plaintiff demands judgment against the defendants for damages, interest and cost of suit.

### **SECOND COUNT**

1. The plaintiff repeats the allegations contained in the First Count as if more fully set forth herein at length.

2. At all times mentioned herein the defendants were acting under color of law. This action is brought against these defendants both in their individual and in their official capacities.

3. The defendant, City of New Brunswick, a municipal corporation organized and existing under the laws of the State of New Jersey located in the County of Middlesex and at all times mentioned herein ,was an employer of the judge and clerk of the Municipal Court and of the John Does who performed services in the Municipal Court on June 7, 2005.

4. Defendant, County of Middlesex, is organized and exists under the laws of the State of New Jersey and at all times mentioned herein, does employ and manage the Middlesex County Corrections Center commonly known as the Middlesex County Workhouse and it is responsible for the conduct of its agents, servants and/or employees whose true identities are unknown to the plaintiff, who were employed at the workhouse from June 7, 2005 until such time as the plaintiff was released from custody. On and after a hearing held on June 7, 2005, at which time there was an Order of the Municipal Court judge releasing the plaintiff from the custody of the county and the workhouse, those present at the hearing failed to abide by the order of the court and continued to restrain the plaintiff at the workhouse against his will.

5. The plaintiff was subjected to false arrest and false imprisonment as a result of the failure to abide by the court's order to release the plaintiff.

6. The aforementioned acts of the employees of the county and the Municipal Court were acts and omissions that deprived the plaintiff of due process, civil and constitutional rights and privileges and immunities guaranteed to him by the Constitution of the United States including but not limited to his Fourth Amendment right to be free from unlawful seizure of his person; his Eighth Amendment right to be free from cruel and unusual punishment; and his Fifth and Fourteenth Amendment rights to due process of law; and 42 U.S.C. Section 1983 and related provisions of federal law.

7. The defendants named herein and those whose true identities are unknown, failed to have proper policies and procedures in effect and failed to adequately train and/or supervise their employees with respect to situations such as that involving the plaintiff and said defendants knew or should have known that their failure to implement appropriate policies and procedures and to properly train and supervise employees would result in civil rights violations such as those described herein.

8. The failure of the defendants named herein to properly train and supervise their employees as well as the actions, inactions, procedures and policies or lack thereof taken, created and implemented by said defendants were a direct and proximate cause of the wrongful conduct and deprivation of rights enumerated above, and of the damages incurred by the plaintiff.

WHEREFORE the plaintiff, Antonio Bolton, demands judgment against the defendants, County of Middlesex, City of New Brunswick, Middlesex County Corrections Center, and its employees, jointly and severally, for compensatory damages; punitive damages; costs of suit; reasonable attorneys' fees; and any further relief that the court deems appropriate.

**JURY DEMAND**

The plaintiff demands a trial by jury as to all issues.

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to the Rules, Richard Galex, Esq. is hereby designated as trial counsel.

**DEMAND FOR DISCOVERY OF INSURANCE COVERAGE**

Pursuant to Rule 4:10-2(b), demand is hereby made that Defendant disclose to Plaintiff's attorneys whether there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a Judgment which may be entered in this action or indemnify or reimburse for payments made to satisfy the Judgment and provide plaintiff's attorneys with true copies of such insurance agreements or policies, including but not limited to any and all declaration sheets. This demand shall be deemed to include and cover not only primary coverage but also any and all excess, catastrophe and umbrella policies.

Dated: February 1, 2008

GALEX WOLF LLC  
Attorneys for Plaintiff

By: Richard Galex  
RICHARD GALEX

CERTIFICATION PURSUANT TO R. 4:5-1

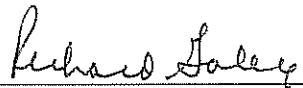
RICHARD GALEX, does hereby certify as follows:

1. I am an attorney at law of the State of New Jersey, and an attorney in the law firm of Galex Wolf LLC., attorneys for the plaintiff, and am familiar with the above captioned matter.

2. To the best of my knowledge, information and belief, there is no other action pending about the subject matter of this Complaint in any court or arbitration proceeding nor are there any other persons known to me who should be added as parties to this matter nor are there any other actions contemplated.

3. I do hereby certify that the foregoing statements made by me are true to the best of my knowledge and if knowingly made false, I am subject to punishment.

Dated: February 1, 2008

A handwritten signature in cursive script, reading "Richard Galex", is written over a horizontal line.

RICHARD GALEX